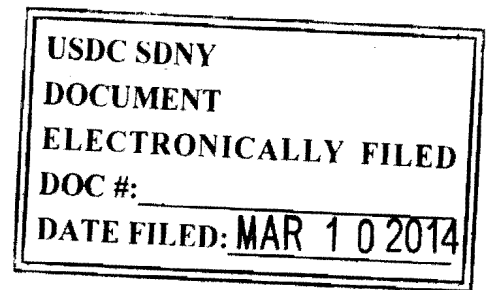


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Office Manager

March 7, 2014

**BY ELECTRONIC MAIL**

The Honorable Katherine B. Forrest  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Ross Ulbricht*  
14 Cr. 68 (KBF)

Dear Judge Forrest:

This letter is submitted on behalf of Ross Ulbricht, whom I represent in the above-entitled case, regarding the Defendant's Pre-Trial Motions on the face of the Indictment, which are currently due Monday, March 10, 2014. For the reasons set forth below, it is respectfully requested that the Court grant a ten-day extension until Thursday, March 20, 2014, for the filing of the Defendant's Pre-Trial Motions. Assistant United States Attorney Serrin Turner has informed me that the government consents to this request as long as the government's time to respond is extended until April 10, 2014, which includes an additional week beyond the mere adjustment of the motion schedule because AUSA Turner will not be available the week of March 24<sup>th</sup>.

The requested extension for the filing of the Defendant's pre-trial motions is necessary because we are simultaneously in the process of organizing and reviewing the non-digital discovery in this case, which is itself voluminous (well more than 10,000 pages). We are also preparing for a six-week trial in another matter, *United States v. Mostafa*, 04 Cr. 356 (KBF), which is set to commence next month before Your Honor. In addition, I have been attending prep sessions for a government witness in an Eastern District of New York trial that begins Monday, and which has consumed substantial time the past two weeks.

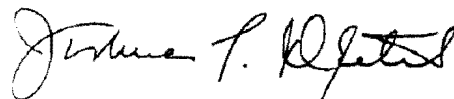
Accordingly, it is respectfully requested that the court approve the revised motion

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**DRATEL & MYSLIWIEC**

Hon. Katherine B. Forrest  
United States District Judge  
Southern District of New York  
March 7, 2014  
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schedule set forth above, including an adjustment of the schedule for the filing of the Defendant's reply. As noted, the government consents to this application.

Respectfully submitted,



Joshua L. Dratel

JLD/lal

cc: Serrin Turner  
Assistant United States Attorney

Ordered  
Application granted. Dates  
adjusted as set forth above.

3/7/14

← B. Forrest  
USDJ